

## Potential Policy Changes

This section provides an outline on potential policy changes for activities related to this RFP. This assemblage of best practices, employed in other states, is representative of the types of changes being contemplated by the State. Respondents should be aware of these considerations and tailor their proposals to accommodate similar changes.

### I. TANF Program

1.	Work Engagement Program	Work Engagement Program aims to immediately engage applicants in job search activities. Participation in these activities may be a condition of eligibility and failure to comply may result in the denial of a person's application for benefits.
2.	Community Work Experience Program (CWEP)	The purpose of CWEP is to provide work experience and to develop employability skills for clients who are unsuccessful in obtaining unsubsidized employment. This could be accomplished by encouraging clients to work the number of hours equal to the combined value of their Food Stamp and TANF grants divided by the minimum wage.
3.	Work Supplementation/ wage subsidy to employers	<p>A Work Supplementation program could provide public assistance and Food Stamp benefits to employers as a work supplementation to be used for hiring and employing public assistance and Food Stamp recipients. This could promote self-sufficiency by providing public assistance and Food Stamp recipients the opportunity to move into unsubsidized jobs. Indiana's Work Supplementation Program could provide wage subsidies to employers per USDA notification and rules. All USDA provisions and requirements could be met for the Work Supplementation Program.</p> <p>This program, along with Community Work Experience and Unsubsidized Employment, could serve to move participants to full-time employment. The Work supplementation program could do this by furnishing employers a wage subsidy to offset their labor costs. In addition, they could receive tax credits while they offer real wage paying jobs for eligible individuals. While, Community Work Experience simulates work, Work Supplementation Jobs are work. Work Supplementation takes place in a real job setting with an employer and allows participants to gain work skills and build job histories. Work Supplementation Jobs are generally three months in duration with the option to extend for three additional months when the participant is placed in a "permanent job." The Work Supplementation Jobs are meant to be of high quality so that successful participants can quickly move into unsubsidized jobs. The Work Supplementation program is an integral component of the employment continuum.</p> <p>Work Supplementation Jobs should not displace other employees and should follow all state and federal requirements. Preference should be given to employers who hire participants who perform successfully in their Work Supplementation Job.</p>

4.	Work Requirements for non-custodial parents who are delinquent in child support payments	<p>Work Requirements for non-custodial parents who are delinquent in child support payments applies to situations in which an individual owes past-due child support with respect to a child receiving assistance under a State's program funded under title IV-A of the federal Social Security Act.</p> <p>The State has in effect laws giving the State authority to seek a court order or administrative order that encourages the individual to pay such support according to an approved plan or participate in work activities, if not incapacitated, in accordance with §466(a)(15).</p>
5.	Full Engagement in simulated work-week activity	<p>Full Engagement in simulated work-week activities encourages TANF adults in households receiving cash assistance to be engaged in at least 30 hours of eligible activity/week.</p> <p>In order to meet federal participation rates, 20 hours of activity should be in eligible work activity including community work experience, subsidized work or unsubsidized work.</p> <p>The only allowable exemptions are the federal TANF exemptions such as caring for a child less than one year of age.</p> <p>Full engagement means that participants will be assigned meaningful activities and that those activities may be recorded and tracked to ensure that the participant did the activities.</p>
6.	TANF Emergency Assistance	<p>Recipients of TANF Emergency Assistance, which is for Child Welfare Prevention Services, would no longer have to meet the 250% of poverty test.</p>
7.	Engagement of individuals with Substance Abuse, Domestic Violence and Rehabilitation Issues – Counting Treatment Programs	<p>This policy change could allow treatment programs for individuals with rehabilitation issues to be included as a mandatory activity in the self-sufficiency plan. Individuals who refuse or fail to participate without good cause in their treatment program could be sanctioned. Concurrently or as soon as possible, these individuals could also be assigned to other activities such as Community Work Experience, Job Search, and when appropriate to Vocational Rehabilitation providers.</p>
8.	Relocation Expenses	<p>This program could provide funding for people living in areas without employment opportunities to relocate to an area near a job.</p>
9.	TANF operational policy changes related to school attendance and immunization	<p>One of the major purposes of the TANF program is to strengthen the responsibility of both parents to care for their children. The purpose of this initiative is to put more emphasis on the requirements to immunize children and to keep them in school.</p>

10.	Teen pregnancy/ Abstinence Education/ Marriage Preservation/ Work-based high schools	These efforts could focus on the third and fourth purposes of TANF: “ to prevent and reduce the incidence of out-of-wedlock pregnancies” and “encourage the formation and maintenance of two-parent families.” They particularly focus on at-risk teens by providing them with information to help them make better choices and with positive alternatives such as work-based high schools.
11.	Increase engagement of participants who have physical, mental or substance abuse issues.	<p>These participants are counted for federal participation and should be engaged in work activity. Currently many of these individuals are not engaged in activities. The purpose of this initiative could be to increase the overall engagement of these individuals. This will require the following approach:</p> <ol style="list-style-type: none"> <li>1. Establishing categories of disability and engagement and appropriate work assignments for OJT, community work experiences, CWEP, or wage subsidy programs.</li> <li>2. Selecting a contractor to screen all persons now so identified and all future applicants to establish an appropriate level or degree of engagement.</li> <li>3. Coordinating activities with vocational rehabilitation.</li> </ol>
12.	24 Month Limit for TANF/FS benefits (note: this includes not allowing child only grants for intact families)	The 24 month limit is very clear in-state law for both adults and for children. Currently the state allows households with children to receive a partial grant after they reach the 24 month limit. The purpose of this initiative is to enforce the 24 month limit for both adults and children. It could provide a 90 day phase-out for cases that are beyond the 24 month limit unless they meet the extension criteria. During the 90 day period the families could receive intensive employment assistance opportunities such as job search, work experience, or a wage subsidy job. For cases which have not met the 24 month limit, an intensive evaluation with an updated self-sufficiency plan should occur during the 18 <sup>th</sup> month in anticipation of the end of benefits at the 24 <sup>th</sup> month.
13.	Eliminate zero grant cases	<p>Current law and policy allow and encourage participants with high earnings and income to remain open for TANF with a zero grant. While there may be some advantages to this, such as continuous Medicaid, it is contrary to the spirit of TANF because it encourages dependency and falls short of encouraging self-sufficiency. This policy initiative could end the zero grants. This change could accomplish two goals:</p> <ol style="list-style-type: none"> <li>1. To encourage participants to seek better employment with more hours and higher wages.</li> <li>2. To make the program more consistent with TANF's purpose of being a temporary program.</li> </ol>
14.	Child only Immigrant cases	Currently these cases have no work requirement for adult recipients which encourages dependency and sets a poor example for their children. This initiative could require the engagement of the Immigrant adult(s) in the household. By making them SSP (state funded) cases, it could be possible to engage recipients in work activities.

## II. Food Stamp Employment and Training (FSET) Program

15.	Work Engagement Program	Work Engagement Program could immediately engage applicants in job search activities. Participation in these activities is a condition of eligibility. Failure to comply means a person's application for benefits may be denied. Job search activities do not apply to families with children under the age of six.
16.	Serve ABAWD participants through the regular FSET program rather than the ABAWD program.	The ABAWD program has many restrictions and penalties which require complex tracking systems. Able-Bodied Adult without Dependents (ABAWD) participants who are served through the regular FSET program with a self-sufficiency plan of at least 20 hours of work activity are not subject to normal limitations of the ABAWD program.
17.	End the labor surplus waiver so that all ABAWD participants will be served.	Ending the labor surplus waiver could make the work requirement on single adults consistent with the expectation on custodial parents with children. It does not make sense to have fewer expectations on single individuals to move from dependency to self sufficiency than TANF single moms with kids.
18.	Remove the use of the 15% exemption for ABAWD participants who are not in compliance.	By using the regular FSET program, the difficulties of the ABAWD program can be avoided while at the same time participants are held accountable to participate in assigned work activities. There is no need to have this exemption. It is better to send the message that participation in work is a requirement that does not get waived.
19.	Voluntary Participation - Other matching sources	This is an initiative to find other agencies (such as criminal justice) or community organizations or foundations that can find matches for voluntary and mandatory FSET participants. Many other states have expanded their FSET programs by finding and using these other sources of "match" and have been able to increase FSET services for training, child care, rehabilitation, and offender reentry. This is a way to increase federal participation.

20.	Become a "pledge" state.	<p>Indiana should commit to serving FSET participants from all parts of the state.</p> <p>By pledging universal engagement for all ABAWDS, the state could draw additional funding from USDA.</p> <p>This initiative could offer every applicant or recipient Able-Bodied Adult without Dependents (ABAWD) subject to the three-month time limit on participation a qualifying education, training, or workfare opportunity. If the client fulfills the requirements of his or her education, training, or workfare component, he or she can continue to receive benefits.</p>
21.	Add a category of "other" activities. These activities are designed to enable individuals to remove barriers to employment as they process towards self-sufficiency.	<p>This initiative adds additional optional activities including:</p> <ul style="list-style-type: none"> <li>▶ The provision of child care services to an individual who is participating in community service.</li> <li>▶ Counseling especially as it relates to offender reentry issues and substance abuse treatment.</li> <li>▶ Other work support activities such as housing assistance and referral to drug treatment that are essential to assisting the individual to move to self-sufficiency through work.</li> </ul>
22.	Remove exemptions for cost of participation and transportation. Align Exemptions with Indiana's TANF Plan. Outline clear sanction policy.	<p>This initiative eliminates the exemption for families with children under 6, and reduces the number of exemptions for health and other reasons for TANF and Food Stamp dual eligible clients. Food Stamp only cases could continue to have the children under 6 exemption.</p> <p>This could expand the number of FSET participants who should be engaged and served and make FSET more consistent with TANF.</p> <p>This includes the following three initiatives designed to make sanctions more effective and consistent:</p> <ul style="list-style-type: none"> <li>▶ Using the simplified Food Stamp plan to align FSET with the TANF sanction policy.</li> <li>▶ Implementing the option to do concurrent sanctioning with comparable programs (i.e. TANF and UI).</li> <li>▶ Implementing the state option to do full household sanctions for non-compliance with work requirements.</li> </ul>
23.	Child Care supportive service payment	<p>Under this initiative, the FSET child care supportive service payment could be consistent with TANF child care supportive service payment policy. This could eliminate the \$200 maximum FS child care reimbursement as changed by the Hunger Act of 1988.</p>

### III. FS Operational

24.	Extend the TANF policy encouraging cooperation with Child Support as a condition of Eligibility for Food Stamps	All parents who are applicants or recipients for TANF cash assistance should cooperate in good faith with the efforts of a child support agency to establish paternity or to secure and enforce a child support order on behalf of any minor child of that parent, regardless of whether that parent is the custodial or non-custodial parent in a child support case, unless good cause is found. This initiative extends that policy as a condition of eligibility for Food Stamps. This is an allowable option for states. It coordinates policies between Food Stamps and TANF and it supports the goal of strengthening the responsibility of both parents to care for their children.
25.	Select additional Food Stamp Operational Plan options	<p>With this initiative, Indiana could implement the following options which the federal Food and Nutrition Service (FNS) makes available to states:</p> <ul style="list-style-type: none"><li>a) Transitional benefits (add transitional benefits for 90 days)</li><li>b) \$100 reporting - unearned income</li><li>c) Simplified homeless housing costs</li><li>d) Simplified Utility allowance (use average utility costs instead of individual documentation to reduce errors)</li><li>e) Simplified deductions</li><li>f) Electronic application filing</li></ul> <p>Indiana could select these options for the purpose of improving the program and simplifying the eligibility process.</p>

### IV. FS Work Supplementation

26.	Work supplement/ wage subsidy to employers	<p>A Work Supplementation program could provide public assistance and Food Stamp benefits to employers as a work supplementation to be used for hiring and employing public assistance and Food Stamp recipients. This could promote self-sufficiency by providing public assistance and Food Stamp recipients the opportunity to move into unsubsidized jobs. Indiana's Work Supplementation Program could provide wage subsidies to employers per USDA notification and rules. All USDA provisions and requirements could be met for the Work Supplementation Program.</p> <p>This is meant as an optional strategy, along with Community Work Experience and Unsubsidized Employment to move participants to full-time employment. A Work Supplementation Program could do this by furnishing employers a wage subsidy to offset their labor costs. In addition, they could receive tax credits while they offer real wage paying jobs for eligible individuals. While Community Work Experience simulates work, Work Supplementation Jobs are work. Work Supplementation takes place in a real job setting with an employer and allows participants to gain work skills and build job histories. Work Supplementation Jobs are generally three months in duration with the option to extend for three additional months when the participant is placed in a "permanent job." The Work Supplementation Jobs are meant to be of high quality so that successful</p>
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		<p>participants can quickly move into unsubsidized jobs. A Work Supplementation Program could be an integral component of the employment continuum.</p> <p>Work Supplementation Jobs should not displace other employees and should follow all state and federal requirements. Preference should be given to employers who hire participants who perform successfully in their Work Supplementation Job.</p>
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#### V. Simplified Food Stamp Plan

27.	Lower Caretaker exemption to one year of age	This initiative could seek federal approval to waive the caretaker exemption for food stamp work registration contained in Section 6 (d) 2 (B) of the Food Stamp Act in order to lower the age of the qualifying dependent child to one year of age. This could align the Food Stamp policy with the TANF policy and place the same expectation on recipients to engage in work activity to move from dependency to self-sufficiency.
28.	Ignore Child Welfare payments	This initiative could modify Food Stamp eligibility and budget calculations to ignore Child Welfare (foster care) payments for a foster child who is in the Food Stamp group. This could bring into conformity the budgeting for Child Welfare payments between TANF and Food Stamps. The purpose of this initiative is to make it easier to retain and attract foster parents and simplify eligibility determinations by having a consistent policy between food stamps and TANF.

#### VI. Child Support

29.	Extend the TANF policy encouraging cooperation with Child Support as a condition of Eligibility to Food Stamps and Child Care	This policy is already being implemented by Child Support for TANF. This initiative could extend the same policies and procedures to Food Stamp and Child Care applicants and recipients.
30.	Work Requirements for non-custodial parents who are delinquent in child support payments	<p>Work Requirements for non-custodial parents who are delinquent in child support payments is already in the current Indiana Child Support State Plan. This initiative could implement the policy. This could apply to situations in which an individual owes past-due child support with respect to a child receiving assistance under a State's program funded under title IV-A of the federal Social Security Act.</p> <p>The State has in effect laws giving the State authority to seek a court order or administrative order that encourages the individual to pay such support according to an approved plan or participate in work activities, if not incapacitated, in accordance with §466(a)(15).</p>

VII. Child Care Development Block Grant

31.	Extend the TANF policy encouraging cooperation with Child Support as a condition of Eligibility for Child Care.	All parents who are applicants or recipients for TANF cash assistance should cooperate in good faith with the efforts of a child support agency to establish paternity or to secure and enforce a child support order on behalf of any minor child of that parent, regardless of whether that parent is the custodial or non-custodial parent in a child support case, unless good cause is found. This initiative extends that policy as a condition of eligibility for Child Care. This is an allowable option for states. It coordinates policies between Child Care and TANF and it supports the goal of strengthening the responsibility of both parents to care for their children.
32.	FSSA will do data matching including matches with UI to identify individuals who are receiving child care yet are not engaged in work, training, education or approved TANF IMPACT activity. These individuals will be terminated from Child Care.	Child care assistance is only intended for participants who are working or are cooperatively participating in approved activities which will help them move to work. This initiative could help to enforce that requirement.

VIII. Medicaid

33.	Enforce statute and state plan which will make TANF sanctioned participants ineligible for Medicaid.	This initiative could enforce current state statute and increase the penalty for TANF sanctions. It is designed to reinforce participant behavior that leads to independence and self-sufficiency.
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